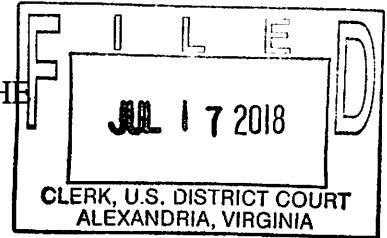


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division



UNITED STATES OF AMERICA)
) CRIMINAL NO. 1:18-CR-83
v.)
) Trial Date: July 25, 2018
PAUL J. MANAFORT, JR.,)
) The Honorable T. S. Ellis, III
)
Defendant.) UNDER SEAL, EX PARTE

MOTION FOR USE IMMUNITY FOR TRIAL TESTIMONY

The United States of America, by and through Special Counsel Robert S. Mueller, III, hereby moves that this Court issue an order pursuant to Title 18, United States Code, Sections 6002 and 6003, compelling James Brennan to give testimony or provide other information, which James Brennan refuses to give or provide on the basis of his privilege against self-incrimination, as to all matters about which James Brennan may be interrogated in the trial styled United States v. Manafort, Criminal No. 1:18-cr-83, or at any other proceeding ancillary to the above-styled matter, and respectfully alleges as follows:

1. James Brennan has been called to testify or provide other information before said trial.
2. In the judgment of the undersigned, the testimony or other information from said witness may be necessary to the public interest.
3. In the judgment of the undersigned, said witness has refused to testify or provide other information on the basis of his privilege against self-incrimination.
4. This application is made with the approval of Raymond Hulser, Deputy Assistant Attorney General of the Criminal Division of the Department of Justice, pursuant to the authority

vested in him by Title 18, United States Code, Section 6003 and Title 28, Code of Federal Regulations, Section 0.175. A copy of the letter from the Deputy Assistant Attorney General expressing such approval is attached hereto.

Respectfully submitted,

ROBERT S. MUELLER, III
Special Counsel

By:

/s/ 

Andrew Weissmann
Greg D. Andres
Brandon L. Van Grack
Special Assistant United States Attorneys
Special Counsel's Office

U.S. Department of Justice
950 Pennsylvania Ave., NW
Washington, DC 20530
Phone: (202) 616-0800

ATTACHMENT A



U.S. Department of Justice

Criminal Division

Assistant Attorney General

Washington, D.C. 20530

July 11, 2018

Robert S. Mueller, III
The Special Counsel
The Patrick Henry Building
601 D Street, N.W.
Washington, D.C. 20530

Attention: Brandon Van Grack
Special Counsel's Office

Re: *United States v. Paul J. Manafort, Jr.*: immunization of James Brennan

Dear Mr. Mueller:

Pursuant to the authority vested in me by 18 U.S.C. § 6003(b) and 28 C.F.R. § 0.175(a), I hereby approve your request for authority to apply to the United States District Court for the Eastern District of Virginia for an order, pursuant to 18 U.S.C. §§ 6002-6003, requiring James Brennan to give testimony or provide other information in the above matter and in any further proceedings resulting therefrom or ancillary thereto, provided that he refuses to testify or provide information on the basis of the privilege against self-incrimination.

Sincerely,

Raymond N. Hulser
Deputy Assistant Attorney General